

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:)
)
SHARON DIANE HILL) Case Number 01-22574 JAD
 Debtor,) Chapter 13
)
ROBERTA A. DeANGELIS,) Related to Doc. No. 560 and 570
Acting United States Trustee)
For Region 3,)
Movant,)
)
v.)
)
COUNTRYWIDE HOME LOANS,)
INC., GOLDBECK, McCAFFERTY)
AND McKEEVER, and)
ATTORNEY LESLIE PUIDA)
Respondents)

PRE-PRELIMINARY HEARING STATEMENT

AND NOW, comes C. Charles Townsend, by and through his attorneys, Pietragallo Gordon Alfano Bosick & Raspanti, LLP, who hereby submits the following Pre-Preliminary Hearing Statement. During the Preliminary Hearing on November 22, 2010:

1. Mr. Townsend will be present and prepared to present himself and the Proffer of Anticipated Testimony to this Court attached hereto as Exhibit 1.
2. If necessary, Mr. Townsend will request the opportunity to present corroborating testimony in a full evidentiary hearing.
3. Counsel for Mr. Townsend requests the opportunity to preserve and/or present all legal and jurisdictional issues, if required, at or after the preliminary hearing.

Respectfully submitted,

PIETRAGALLO GORDON ALFANO
BOSICK & RASPANTI, LLP

/s/ William Pietragallo, II _____

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